

# **Exhibit 13**

1                   John Farrell

2     43 for almost three years.

3         A.     I can't remember the exact amount  
4     of time I was in these places. I remember being  
5     in them. The exact amount of times, you know, I  
6     moved around a lot in the police department.

7         Q.     I appreciate that these events  
8     happened quite a long time ago, and I'm only  
9     asking you to do the best you can with whatever  
10    memory you have.

11        A.     That's fine.

12        Q.     But I do want to, you know, from  
13    time to time, I'll press you a little bit to see  
14    if I can get a more exact memory of it.

15               Do you remember approximately what  
16    year it was that you went to the Manhattan DA's  
17    Squad?

18        A.     1981, approximately 1981.

19        Q.     How long were you in the Manhattan  
20    DA's Squad?

21        A.     I was in the Manhattan DA's Squad  
22    until 1986, I believe, and then I went to the  
23    19th Detective Squad.

24        Q.     How long were you there?

25        A.     A very short time, and then I went

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1                   John Farrell  
2         to the Manhattan South Task Force, Detective  
3         Task Force on Night Watch.

4                 Q.     On Night Watch, all right. So the  
5         Night Watch was part of the Manhattan South Task  
6         Force Detective Squad?

7                 A.     Yes.

8                 Q.     Approximately what year did you go  
9         to Night Watch, if you can remember?

10                A.     I said I believe it was 1986.

11                Q.     '86, all right. And is that the  
12         position you were in when you retired?

13                A.     Yes.

14                Q.     During your time in the Manhattan  
15         DA's Squad, which was approximately what, five  
16         years, 1981 to 1986?

17                A.     Yes.

18                Q.     Were there any particular cases  
19         that you were assigned to work on?

20                A.     I worked on everything, organized  
21         crime, white collar crime and anything that the  
22         DA's office decided to investigate.

23                Q.     Did you work on any sex crimes  
24         cases?

25                A.     No, I don't believe I did, no.

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1                   John Farrell

2                 Q.     Did you work on any homicides when  
3     you were in the DA's Squad?

4                 A.     I don't believe I did while on the  
5     DA's Squad, no.

6                 Q.     During the time you were assigned  
7     to the Manhattan DA's Squad, did you know Linda  
8     Fairstein?

9                 A.     Yes.

10                Q.     And did you work on cases with her  
11    during the time you were in the Manhattan --

12               A.     District Attorney's.

13               Q.     -- DA's Squad?

14               A.     I don't recall.

15               Q.     How did you know her?

16               A.     She was a sex crimes prosecutor for  
17    the DA's office.

18               Q.     During that entire period of time  
19    you were there?

20               A.     I believe so. I'm not sure if she  
21    left before me or after me. I didn't keep track  
22    of her. I don't know.

23               Q.     Do you recall whether you actually  
24    worked on a case with her though?

25               MR. MYERBERG: Objection.

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1                   John Farrell

2                 A.       I don't recall. I know I've worked  
3       on cases with other people that might have  
4       worked on cases with her. But that's the way it  
5       was in the DA's Squad, they tell you to go out  
6       and help someone.

7                 Q.       File your report and go on to the  
8       next one?

9                 A.       Yes.

10                Q.       Did you know Elizabeth Lederer?

11                A.       Yes.

12                Q.       Do you recall ever working on any  
13       cases with her?

14                A.       I've seen her a few times, so I  
15       believe maybe I did. I'm not sure.

16                Q.       Before April of 1989?

17                A.       I'm not really sure.

18                Q.       But you think you may have worked  
19       on some matters with her before then?

20                MR. MYERBERG: Objection.

21                A.       I'm not positive.

22                Q.       I'm not asking you to be positive.  
23       But you think you might have worked on some  
24       cases with her, right?

25                A.       I don't know.

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1                   John Farrell

2                 Q.     What about an Assistant District  
3     Attorney named Nancy Ryan, do you know her? Did  
4     you know her when you were in the squad?

5                 A.     I don't remember the name, no.

6                 Q.     Is this the first time you're  
7     hearing her name?

8                   MR. MYERBERG: Objection. Are you  
9     saying outside the presence of counsel? I  
10    mean, is that the question? If it is, it's  
11    privileged.

12                Q.     I'm sorry, outside of the presence  
13    of any conversations you may have had with any  
14    of your lawyers, have you ever heard her name  
15    before?

16                A.     I don't recall hearing her name  
17    before.

18                Q.     What about a District Attorney  
19    named Peter Casolaro, did you ever work with  
20    him?

21                A.     I never heard of him.

22                Q.     You never heard of him, all right.  
23                   How about a District Attorney named  
24    Harlan Levy, did you ever work with him when you  
25    were in the DA's Squad?

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